- Measures have been taken, by the Utah
 Department of Health, Bureau of Health
 Promotions, to ensure no conflict of
 interest in this activity.
 - CNE/CEU's are available for this live webinar. You must take the pre and post tests. 80% is required on the post test to receive CNE/CEU's.
 - Certificates will be emailed out to you within two weeks

PROFESSIONAL and **PERSONAL**

CONTINUOUS GLUCOSE

MONITORING SYSTEM

and



INSURANCE REIMBURSEMENT

Mary Ann Hodorowicz, RD, MBA, CDE
Certified Endocrinology Coder
Mary Ann Hodorowicz Consulting, LLC 4-30-15



Mary Ann Hodorowicz

RD, LDN, MBA, CDE, CEC (Certified Endocrinology Coder) Mary Ann Hodorowicz, RD, LDN, MBA, CDE, CEC, is a licensed registered dietitian and certified diabetes educator and earned her MBA with a focus on marketing. She is also a certified endocrinology coder and owns a private practice specializing in corporate clients in Palos Heights, IL. She is a consultant, professional speaker, trainer, and author for the health, food, and pharmaceutical industries in nutrition, wellness, diabetes, and Medicare and private insurance reimbursement. Her clients include healthcare entities, professional membership associations, pharmacies, medical CEU education and training firms, government agencies, food and pharmaceutical companies, academia, and employer groups. She serves on the Board of Directors of the American Association of Diabetes Educators.

Mary Ann Hodorowicz Consulting, LLC www.maryannhodorowicz.com hodorowicz@comcast.net 708-359-3864
Twitter: @mahodorowicz

Learning Objectives

- 1. Describe Medicare beneficiary eligibility criteria for CGM
- 2. Name the 3 HCPCS codes for 3 parts of CGM system that are used by CGM manufacturer to bill Medicare for reimbursement
- 3. Name the 2 CPT procedure codes used by providers to bill Medicare for professional CGM:
 - a. Sensor placement, hook-up, calibration of monitor, pt training, removal of sensor, data download and printout of recording
 - b. Ambulatory CGM of interstitial tissue fluid via subcutaneous sensor for minimum of 72 hrs; interpretation and report
- 4. Name the Medicare benefits that the CGM interpretation may be billed under if performed by a non-physician clinician (RN, MA, lab tech, RD, CDE)

CGM Reimbursement Facts*

- Approximately 92% of commercial covered lives in U.S. covered by insurer with written policy for Personal and Professional CGM
- Very important to understand specific coverage criteria for payers in your area, as each plan may have different criteria for pt selection and billing
- Medicare has not established a national coverage policy for Professional CGM
 - Means that coverage is determined by each of the local contractors (also referred to as "carriers" or Medicare Administrative Contractors) who process Medicare claims

^{*} Source: Professional CGM Reimbursement Guide by Medtronic

CGM Reimbursement Facts*

- Currently, Professional CGM under CPT codes 95250 and 95251 payable by Medicare in all 50 states
- However, local policies may change as Medicare continues to consolidate its Administrative Contractors
 - Thus, it is imperative that HCPs always check with their local Medicare contractor (call or access website) to determine most current policy in place for Professional CGM
 - Websites for current Medicare contractors provided at www.cms.gov

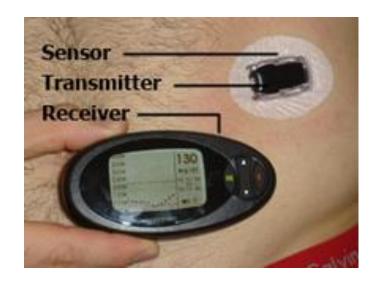
^{*} Source: Professional CGM Reimbursement Guide by Medtronic

About a Continuous Glucose Monitoring System (CGMS)

- CGMS refers to all manufacturers of CGM devices
- Has evolved since introduction of
- CGM now refers to both:
 - Professional CGM is used as diagnostic test
 - Personal CGM:
 - Long-term personal use by pt
 - Pt owns CGM device and hardware

CGMS Devices: Supplement To SMBG

 FDA-approved CGMS's are supplement to, not replacement of, standard finger stick SMBG testing





Electronic CGM
Recorder/Receiver with
Sensor inserted in abdomen
and Transmitter attached

Professional versus Personal CGM

- Professional CGM:
 - Diagnostic test for use by HCPs
 - FDA-approved hardware owned by HCP
 - HCP uses BG data to evaluate pts' BG patterns
 - Pt placed on device in HCP's practice setting
 - Pt wears for minimum of 72 hrs for purpose of:
 - Auto recording and storing of BG measurements
 - Pt returns device to HCP after 72 hrs
 - HCP downloads BG data from device into computer via specialized software from device co.
 - HCP interprets data to aid in treatment decisions
 - HCP completes and documents full report

Professional versus Personal CGM

- Personal CGM
 - Not diagnostic test
 - Hardware owned by pt
 - HCP and pt use BG data to evaluate pts' BG patterns
 - Pt can view real-time CGM data q 5 min.
 - Pt can set alarms for high or low BG levels
- CGM data particularly helpful in detecting:
 - Nocturnal (night time) hypoglycemia
 - Postprandial (post meal) hyperglycemia

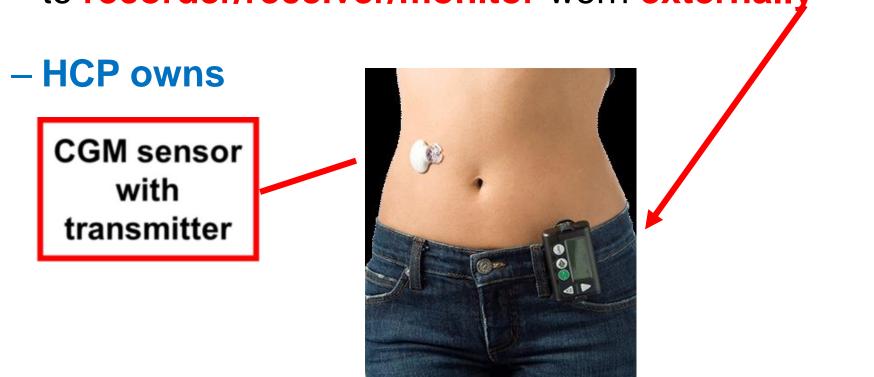
Professional CGM

- Allows for printable reports and illustrative graphs
- Real-time BG data displayed + trends and alerts
- Pt benefits:
 - Acts as powerful education + reinforcement tool as graphs help HCPs and pts understand effects of diet, exercise, meds, etc. on BG levels
- Fingersticks required to calibrate glucose sensor and before making treatment decisions
- Minimal pt training to get started at first visit:
 - Hook-up and calibration training required
 - Typically no counseling on meaning of BG values

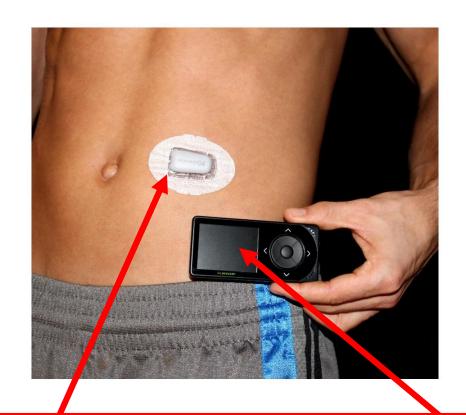
Glucose sensor

- Tiny electrode....discarded after pt use*
- Inserted into abdomen's subcu tissue w/ wire probe
- Reads interstitial fluid glucose q 5 min. for each day of evaluation period (3 days....72 hours)
- Wirelessly connected to recorder/receiver/monitor, and worn outside of body
- *New glucose sensor used for each:
 - *New pt and new episode of use
- HCP removes after 72 hour evaluation period
- HCP purchases sensors

- Transmitter
 - Tiny device physically connected to sensor
 - Sends glucose values via wireless radio frequency to recorder/receiver/monitor worn externally



A PICTURE IS WORTH A THOUSAND WORDS



Electronic CGM Recorder/Receiver/Monitor with

Sensor inserted in abdomen and Transmitter attached to Sensor

- Recorder/Receiver/Monitor
 - Worn outside of body
 - Wirelessly connected to transmitter which is connected to sensor which is inserted into abdomen with wire probe
 - Re-used
 - Re-chargeable
 - Stores glucose values read in interstitial fluid
 - HCP removes after 72 hour evaluation period
 - HCP owns

- Recorder/Receiver/Monitor is:
 - Cleaned after pt use
 - Attached to electrical charger for next pt use
- BG data downloaded to software for report generation from:
 - Recorder/receiver/monitor and
 - BG meter values

- Throughout 72 hour evaluation period, pt must manually record:
 - Food eaten at meals (esp. carb grams)
 - Insulin doses and times
 - Perceived hypoglycemic events + time of day
 - Exercise: duration, type, time of day

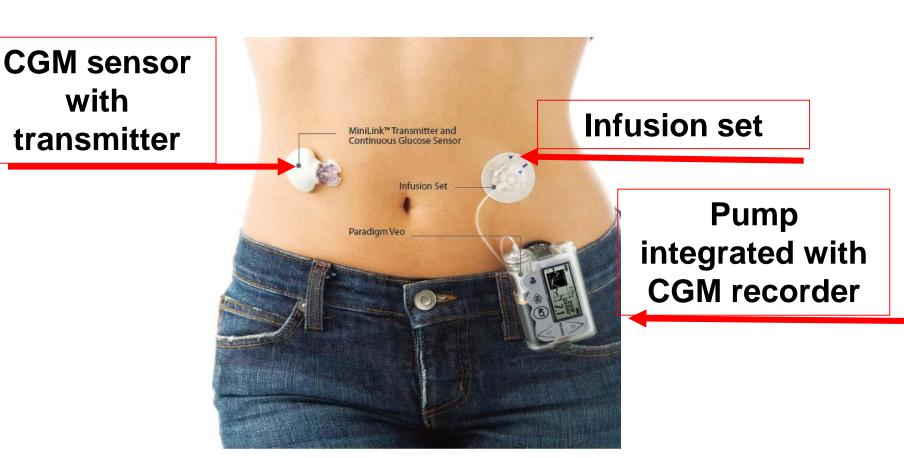
- Software (HCP owns)
 - Installed on ordinary office computers
 - Used to start up pts, download data from recorder + generate reports
 - Reports = illustrated line graphs of all recorded glucose values, times of, etc.
 - Reviewed + interpreted by HCP
- BG meter (patient owns)
 - Pt must also calibrate CGM with finger stick BG meter tests 4x/day

Integrated Systems: CGM + Insulin Pump

- Second-generation = integrated/combined CGM and insulin pump systems
 - -CGM recorder/receiver/monitor built into pump
 - Glucose sensor (probe inserted into abdomen's subcutaneous tissue) is separate device
 - Medtronic MiniMed Paradigm RevelTM Insulin Pump
 - Guardian® REAL-Time CGM System
 - Animas Vibe®: Pump integrated with Dexcom G4
 Platinum 7-Day Sensor CGM; waiting FDA approval in US market as of 10-18-13 (approved in Europe)

Integrated Systems: CGM + Insulin Pump

 CGM sensor inserted in abdomen and insulin pump integrated with CGM recorder



Professional vs. Personal CGM: Medicare Coverage

- Personal CGM:
 - Centers for Medicare and Medicaid Services (CMS, governing body over Medicare) does NOT reimburse personal CGM with pt-owned device!
- Medicare states that:
 - Services provided primarily for convenience of beneficiary or provider are not medically necessary
 - All services reported to CMS must be medically necessary
 - Claiming a non-covered service as a covered service could be viewed as fraud

Professional CGM Medicare Coverage Guidelines: Beneficiary Eligibility

Professional CGM:

- Covered by CMS
- Prior to hook-up, beneficiary must have:
 - Completed full 10 hour initial DSME/T program
 - Documented frequency of SMBG at average of 4x/day during previous month
 - Shown compliance with recommended:
 - Diet, medication regimen and other treatment regimens Rx'd by provider

Medicare Coverage Guidelines for Professional CGM: Beneficiary Eligibility

- Met all criteria for medical necessity (to be documented by HCP):
 - A1c >8%

And

Insulin-dependent (Type 1 or Type 2)
 And

 Having frequent, unexplained hypoglycemic (<50 mg) episodes

OR

 Having unexplained, large fluctuations in daily pre-prandial BS values

Medicare Coverage Guidelines for Professional CGM: Beneficiary Eligibility

And

- Not well controlled as evidenced by high A1c
 or
- Having episodes of ketoacidosis or hospitalizations for uncontrolled BG levels
 or
- To start insulin for 1st time or start insulin pump
 or
- Is compliant with T2 DM therapy but results in unexplained hypoglycemia or poor A1 response

Medicare Coverage Guidelines for Professional CGM: Beneficiary Eligibility

or

- Has DM and newly pregnant or
- Has DM and about to conceive or
- Has DM and pregnant and having trouble controlling DM



Medicare Coverage Guidelines for Professional CGM: Hardware

- For beneficiary to obtain CGM hardware, beneficiary must first complete this process:
 - Signs document provided by CGM manufacturer titled: Assignment of Benefits and Release of Medical Information
 - In document, beneficiary is:
 - Assigning Medicare reimbursement for CGM device directly to CGM manufacturer
 - Authorizing release of his/her medical info to CGM manufacturer

Assignment of Benefits and Release of Medical Information to be Signed by Beneficiary

(CGMS company) recognizes that medical information is confidential and will
maintain the privacy of your medical information. Information will only be used and disclosed
in accordance with the requirements of the Health Insurance Portability and Accountability
Act of 1996 (HIPAA). However, many insurance companies require that medical information
be submitted with claims to determine medical necessity. In order to authorize(CGM
manufacturer) to obtain medical information from your healthcare team, please complete, sign
and date the statement below. I(beneficiary) do hereby authorize(CGM manufacturer)
to submit claims to my insurance company/companies on my behalf, and my insurance
company/companies to make payments directly to(CGM manufacturer) for my continuous
glucose monitoring products. I also authorize to submit referrals to contracted
distributors if necessary to obtain reimbursement.

Assignment of Benefits and Release of Medical Information to be Signed by Beneficiary, Continued

I understand I am responsible for any deductible co-payment and other amounts not covered by				
my insurance company/companies(CGM manufacturer) will make every reasonable effort				
to collect payment from my insurance company. In the event the insurance company refuses to				
pay, I will assume full responsibility for the payment. I understand that if my insurance				
company does not accept assignment of benefits, all correspondence and payments for service				
may be sent directly to me. I agree when such payments are received by me, I will make				
payment on my bill with a credit card, personal check, or by endorsing the insurance check				
"Pay to the Order of" within five days. I agree to notifyimmediately of any changes				
to my insurance coverage or if I change my insurance company. I consent to the release of all				
information, including medical records to or from my physician or representative of my physician				
and to or from the insurance company or contracted distributors, for the purposes of				
healthcare management and/or for processing of medical claims.				

Medicare Coverage Guidelines for Professional CGM: Hardware

 For beneficiary to obtain CGM hardware, provider must also first complete following process on next slides.

Note: Beneficiary *cannot* directly submit claim to Medicare for CGM device reimbursement to himself/herself, *after* receiving device.

Medicare Coverage Guidelines for Professional CGM: Hardware

- Complete Statement of Medical Necessity (= Rx for device) on beneficiary's behalf
- Fax Statement to CGMS manufacturer's Managed
 Care Director or Resource Center
 - Managed care director submits request for prior authorization of CGM device to Medicare (or primary health care insurer)
 - Request to include info about device, utility,
 cost and potential cost savings

Statement of Medical Necessity to be Completed and Signed by Provider

Patient First Name:Address:	Last Name:	DOB:
Address:		Male Female
City:	State:	Zip code:
Home Phone #:	Work #	Cell #
ICD-9 Code:	Prescription duration:	∠ Lifetime need No substitutions
Date of Diagnosis:	Prescription for HCPCS codes:	A9278, Receiver (Monitor), 1/365 days A9277, Transmitter, 1/365 days A9276, Sensors, 52/365 days
Patient's existing conditions supporting mo	edical necessity for long-term continuou	s glucose monitoring system:
Tests with fingerstick blood gluce MDI/Multiple daily insulin inject Has an insulin pump. Start date Experiences hypoglycemia episoo Severe hypoglycemic reactions resolved urgent clinic and/or Receives care from an endocrino Clinical indications for long-term continuor Wide fluctuations in blood gluco Hypoglycemia unawareness AM hyperglycemia (Dawn Phene Nocturnal hypoglycemia Diabetic ketoacidosis Neuropathy/nephropathy/retinop Pre-conception planning Fasting hyperglycemia > 150mg/ Inadequate glycemic control designations	equiring the assistance of others. r ER visits to treat significant hypoglycemic plogist or a diabetes specialty clinic. bus glucose monitoring system: see values from to mg/diameter. comenon)	to by log book or meter download.
Please attach documentation supporting the emergency room documentation, etc.).	ne information checked (Log book, mete	r download, clinical notes, urgent care,
Continuous glucose monitoring system training Teaching will be completed by p		d personnel name:
Name of Prescribing Physician: (print)		
Specialty:		UPIN:
Office Address:		NPI:
City:	State:	Zip code:
Office Phone #:	Fax #:	NPI: Zip code: Office Contact:
Physician Attestation & Signature/Date: I certify that I am the physician identified above & have reviewed and signed by me. I certify all the medical nec	reviewed all of the order information above. Any sta	tement on my letterhead attached hereto, has been

supporting documentation, which substantiates the utilization and medical necessity of the products marked above. I understand that any falsification, omission, or

(Stamps are not acceptable)

concealment of material fact may subject me to civil or criminal liability. A copy of this order will be retained as part of the patient's medical record.

Physician's Signature:

Medicare Coverage Guidelines for Professional CGM: Hardware

 When approved by Medicare, CGM hardware sent by manufacturer to:

- Beneficiary
- Provider, or
- Diabetes educator
- Beneficiary training on CGM device use then scheduled by educator or provider

Medicare Coverage Guidelines for Professional CGM: Hardware Codes

 HCPCS codes for CGM device used by manufacturer on claim form to Medicare:

A9276 Sensor

- Invasive (subcutaneous)
- Disposable
- For use with interstitial CGMS
- One unit = 1 day supply, up to 10 per month,

52 per 365 days (1 sensor worn 1 – 3 days)

Medicare Coverage Guidelines for Professional CGM: Hardware Codes

- A9277: Transmitter
 - External
 - For use with interstitial CGMS, 1 per 365 days
- A9278: Receiver (Monitor or Recorder)
 - External, for use with interstitial CGM system
 - 1 per 365 days, per product life expectancy
 - Stores data recorded by sensor downloaded for analysis by HCP
 - Insulin pump not required

Reimbursement Coverage Guidelines for Professional CGM for HCPs

Billing and coding for professional CGM:

95250

 Ambulatory continuous glucose monitoring of interstitial fluid via a subcutaneous sensor for minimum of 72 hours; sensor placement, hook-up, calibration of monitor, patient training, removal of sensor, data download and printout of recording.

- Is a technical service...NOT a professional service
- Can be billed by HCPs who own and operate CGM device
- In general, HCP not in position to bill 95250 if HCP practice does NOT:
 - Own deviceor
 - Has NOT performed most of 95250-related technical services

- Technical service can be performed by nonphysician clinician staff (RN, RPh, MA, RD, CDE) as code does <u>not</u> have any physician work Relative Value Units
 - But service must be within scope of practice and licensure in state
- Can be billed by:
 - Treating provider in provider's practice OR
 - Hospital OP dept; but first must receive provider's
 Rx for CGM technical service

- Summary: If furnished by RN, RPh, MA, RD, CDE, to:
 - Furnish under Rx/referral from physician which means is furnishing under supervision of physician
 - Bill under physician's NPI# if furnished in physician's office
 - Bill under hospital's NPI# if furnished in hospital outpatient dept.
 - Payment may be ~ 15% lower

- Technical service can be performed by nonphysician clinician staff (RN, RPh, MA, RD, CDE) as code does <u>not</u> have any physician work Relative Value Units
 - But service must be within scope of practice and licensure in state
- Can be billed by:
 - Treating provider in provider's practice OR
 - Hospital OP dept; but first must receive provider's
 Rx for CGM technical service

- ○Do not report 95250 more than 1x/month
- ○Do not report 95250 with 99091:
 - 99091 = Physician/health care professional collection and interpretation of physiologic data stored/transmitted by patient/caregiver (bundled rate)
- oIF patient brings in own sensor:
 - Use code modifier -52 as is non-expense to practice setting

95250

- Hospital outpatient dept. services:
 - Medicare pays under outpatient prospective payment system (OPPS)

Code paid under Ambulatory Procedure
 Classification (APC) code: 0607

- Summary: If furnished by RN, RPh, MA, RD, CDE, to:
 - Furnish under Rx/referral from physician which means is furnishing under supervision of physician
 - Bill under physician's NPI# if furnished in physician's office
 - Bill under hospital's NPI# if furnished in hospital outpatient dept.
 - Payment may be ~ 15% lower

- —Ambulatory continuous glucose monitoring of interstitial tissue fluid via subcutaneous sensor for minimum of 72 hrs; interpretation and report
- -Can be done in non face-to-face pt time
- -Data can be **downloaded** by non-physician staff clinicians (RDs, RNs, CDEs)...BUT
- -Data can only be interpreted + report generated by
 - Physicians
 - Qualified non-physician practitioners: NPs, PAs, CNSs

- Analysis, interpretation and report should be clearly documented in patient's chart
- In addition, it is useful to print Professional CGM reports and include them in patient's medical record

- Not to be billed by diabetes center, hospital or other facility as Medicare defines 95251 as a "professional component code only"
 - Means it is restricted to use by physicians and qualified non-physician practitioners
- Facilities provide technical services only (eg, 95250)
- Not to report 95251 more than once per month
- Not to report 95251 with 99091

- Cannot use code if data interpreted and report is generated by non-physician staff (RN, MA, lab tech, RD, CDE)
 - Alternate billing options:
 - G0108 = Individual DSME
 - 97802 = Initial individual MNT
 - 97803 = Established pt, individual follow-up MNT

- Evaluation & management service by physician or qualified non-physician practitioner:
 - May be performed on same day as services for 95250 and 95251
 - Can be billed separately in certain circumstances
 - Documentation must substantiate that significant, separately identifiable E/M service was medically necessary and provided in addition to CGM service
 - This requires physician or mid-level practitioner to take hx, perform physical exam, and engage medical decision-making "above and beyond" usual work associated with CGM

- If separate E/M code billed on same day as CGM code, modifier -25 must be used with E/M code
 - -25: Significant, Separately Identifiable
 Evaluation and Management Service by Same
 Physician or Other Qualified Healthcare
 Professional on Same Day of the Procedure or
 Other Service
- Example: if physician performs CGM data interpretation and also evaluates pt face-to-face for DM symptoms, physician can bill 9921X-25 plus 95251

- Not necessary to have different dx for E/M service and CGM service
- In determining E/M code level, none of the time or services performed for CGM service can be counted towards E/M service

- Reimbursement 2013 rates under physician's NPI#:
 - Medicare unadjusted national rate: \$166
 - Hospital outpatient dept.: \$97 (APC code 0634)
 - Private payer average rate: \$349
 - Contact for your rates
- IF sensor purchased by pt directly:
 - Add modifier -52 as non-expense to practice setting

- 95250 reimbursement 2015 rates:
- Under physician's NPI#:
 - Medicare national rates, facility and non-facility, geographically adjusted: \$111.62 to \$219.68
- Hospital outpatient dept.: APC code 0634
- Private payer <u>average</u> rate: ~\$300.00
 - Contact for your rates
- IF sensor purchased by pt directly:
 - Add modifier -52 as non-expense to practice setting

- Under physician's NPI#:
 - Medicare national rates, facility and non-facility,
 geographically adjusted: \$39.14 to \$59.67
 - Private payer average rate: ~ \$100
- Interpretation and generation of report can only be performed by physician or qualified non-physician practitioner (NP, PA, CNS) and billed by same
- Can be non face-to-face with pt

- Codes 95250 and 95251 may not be reported more than once per month
- Instructional notes added following each code to indicate code may not be reported in conjunction with the collection and interpretation of physiologic data code 99091.

*Reference: 2009 CPT® Changes, Effective January 1, 2009

American Association of Clinical Endocrinologists (AACE). 2009 CPT changes and/or revisions as outlined in American Medical Association CPT 2009 Edition.

- For more ongoing follow-up data interpretation:
 - Physician/mid-level provider: E/M codes (evaluation & management) can be used to bill for more faceto-face interpretation in office visit
 - Bill established pt visit codes 99212 to 99215 (lowest to highest payment), based on level of E/M service provided, OR based on time
 - IF 95250 billed on same day that an E/M code for patient visit billed (e.g., E/M 99215), must:
 - -Add modifier -25 to E/M code (99215-25)

Benefits of Adding CGM to Program/Practice

- ↑ reimbursement with group CGM start-ups
 - Takes ~ 5 10 min./patient for sensor placement hook-up and calibration of BG monitor
 - RN's, RD's, CDEs can typically perform task
- Improves pt outcomes
- Improves scope of DSME/MNT program/practice
- ↑ referrals for CGM to DSME/MNT Program
 - Makes HCP look like true diabetes consultant
 - Pts love convenience of system + visual BG results

Insurance Reimbursement for Personal CGM

- Majority of private health care plans have coverage policies for both personal and professional CGM
- National payers currently covering CPT codes:
 - –Cigna, Humana, Aetna, United Healthcare, Anthem WellPoint
- Coverage criteria DO differ between personal and professional CGM
- Many payers do use same CPT codes for both personal and professional CGM
 - But some payers require personal CGM be billed under DSME or MNT or other patient education or training or self-management procedure codes

Insurance Reimbursement for Personal CGM

- Coverage decisions may also:
 - Limit coverage to specific patients (i.e. Type 1)
 or
 - Limit number of times per year CPT codes 95250 and 95251 may be covered
- 98%+ of commercially insured T1 pts have coverage for CGM*
- CGM coverage for T2 pts on insulin has more than tripled in last 2 years alone* but less insurers cover

^{*} Dexcom internal data file, 2013

6 Key Steps in Office Process for Professional CGM Success

- Planning
 - Clinical approach
 - Allocation of well-trained staff and resources
- Patient selection and scheduling
- Implementation: start-up
 - Inserting CGM sensor + training pts on use
 - Sensor removal, data download + printing reports
- Interpreting data
- Making therapy adjustments + ongoing pt follow-up
- Obtaining reimbursement for CGM services

OK, THEN! GLAD THAT'S OVER! DRINK ANYONE?





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Resources by Mary Ann Hodorowicz

Turn Key Materials for AADE DSME Program Accreditation

- DSME Program Policy & Procedure Manual Consistent with NSDSME (72 pages)
- Medicare, Medicaid and Private Payer Reimbursement
- Electronic and Copy-Ready/Modifiable Forms & Handouts
- Fun 3D Teaching Aids for AADE7 Self-Care Topics
- Complete Business Plan

3-D DSME/T and Diabetes MNT Teaching Aids 'How-To-Make' Kit

• Kit of 24 monographs describing how to make Mary Ann's separate 3-D teaching aids plus fun teaching points, evidence-based guidelines and references

Money Matters in MNT and DSMT: Increasing Reimbursement Success in All Practice Settings, The Complete Guide ©, 5th. Edition, 2015

Establishing a Successful MNT Clinic in Any Practice Setting©

EZ Forms for the Busy RD©: 107 total, on CD-r; Modifiable; MS Word

- Package A: Diabetes and Hyperlipidemia MNT Intervention Forms, 18 Forms
- Package B: Diabetes and Hyperlipidemia MNT Chart Audit Worksheets: 5 Forms
- Package C: MNT Surveys, Referrals, Flyer, Screening, Intake, Analysis and Other Business/Office and Record Keeping Forms: 84 Forms